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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,
Plaintiff,

v.

THE STATE OF CALIFORNIA;
GAVIN C. NEWSOM, in his Official
Capacity as Governor of California;
KAREN ROSS, in her Official Capacity
as Secretary of the California
Department of Food & Agriculture;
ERICA PAN, in her Official Capacity as
Director of the California Department of
Public Health; and ROB BONTA, in his
Official Capacity as Attorney General of
California,

Defendants.

Case No. 2:25-cv-06230-MCS-AGR

**DECLARATION OF SHARON
NÚÑEZ IN SUPPORT OF
PROPOSED DEFENDANT-
INTERVENORS' UNOPPOSED
MOTION TO INTERVENE**

The Honorable Mark C. Scarsi

Date: August 25, 2025

Time: 9:00 a.m.

Location: First Street Courthouse, 350
W. 1st Street, Courtroom 7C, 7th
Floor, Los Angeles, California 90012

Trial Date: None

Action Filed: July 9, 2025

**DECLARATION OF SHARON NÚÑEZ IN SUPPORT OF PROPOSED
DEFENDANT-INTERVENORS' UNOPPOSED MOTION TO
INTERVENE**

I, Sharon Núñez, declare as follows:

1. I am the President of Animal Equality. I have personal knowledge of the facts set forth in this declaration. These facts are true to the best of my knowledge and understanding. If called to testify on these facts, I would do so in a manner consistent with the information presented herein.

2. Animal Equality is an international nonprofit animal protection organization with its U.S. headquarters in Los Angeles. It has over 220,500 supporters nationwide, roughly 29,590 of whom reside in California.

3. Animal Equality's mission is to end cruelty to farmed animals. Through use of petitions, social media, films, newsletters, undercover investigations, email alerts, and legal advocacy, Animal Equality mobilizes its volunteers and supporters to manifest a world in which all animals are respected and protected.

4. Given the sheer number of animals raised for food—over 55 billion¹ per year in the United States alone—Animal Equality pursues that vision with a particular eye toward farmed animal protection. Specifically, Animal Equality expends significant resources to educate consumers about the inhumane treatment of animals inside industrial agriculture operations and to urge governments and corporations to implement meaningful protections for these animals—particularly in regard to the conditions in which they are confined.

5. Recognizing that cruel conditions of confinement are especially widespread in the egg, pork, and veal industries, Animal Equality has dedicated special attention to legal and political reform in these sectors.

6. To that end, Animal Equality became part of a coalition of

¹ Not including aquatic animals.

1 organizations that played a significant role in the success of California Proposition
2 12 (the “Prevent Cruelty California” campaign). For its part, Animal Equality
3 contributed substantial resources to promoting the measure and gathering more than
4 600,000 signatures from registered California voters.

5 7. By the close of the campaign, Animal Equality’s reported financial
6 expenditures in support of Proposition 12’s passage exceeded \$65,000.

7 8. In addition to seeing a return on the financial resources it committed to
8 Proposition 12’s success (in the form of tangible benefits for farmed animals),
9 Animal Equality maintains a significant interest in ensuring the law remains in
10 effect and enforced. Since Proposition 12’s passage, the organization has dedicated
11 significant staff time to ensuring corporate compliance with the law’s sales
12 provisions. For instance, Animal Equality has reached out to affected producers and
13 retailers to educate these companies about Proposition 12’s restrictions and offer to
14 assist them to come into compliance. Animal Equality also intervened in several
15 federal court challenges to defend the law, one of which reached the Supreme
16 Court,² and participated in the regulatory comment process. If Proposition 12 is
17 struck down, the resources Animal Equality has expended to ensure its success, and
18 the goodwill it has garnered with affected industry players in partnership toward
19 that goal, will be nullified, and Animal Equality would need to expend additional
20 resources promoting substitute protections.

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26 ² *North Am. Meat Inst. v. Becerra*, No. 2:19-cv-08569 (C.D. Cal. Oct. 4, 2019);
27 *Iowa Pork Producers Ass’n v. Bonta*, No. 2:21-CV-09940 (C.D. Cal. Dec. 16,
28 2021); *Nat’l Pork Producers Council v. Ross*, Case No. 3:19-cv-02324 (S.D. Cal.
Dec. 5, 2019) (lower court decision in favor of Defendants affirmed in *Nat’l Pork
Producers Council v. Ross*, 598 U.S. 356 (2023)).

1 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the
2 foregoing is true and correct, based on my own personal knowledge and
3 understanding, and, as to those matters, I believe them to be true.

4 Executed this 24th day of July, 2025, in Philadelphia, Pennsylvania.

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